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12
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

13 WILLIAM BERRY, JR,

14 Plaintiff,

15 vs.

16 AARGON AGENCY, INC; PLUSFOUR, INC;
 17 QUANTUM COLLECTIONS; AND
 18 RICHLAND HOLDINGS, INC DBA
 19 ACCOUNTCORP OF SOUTHERN NEVADA,

20 Defendants.

21 Case No.: 2:20-cv-02144-APG-EJY

22
JOINT MOTION FOR EXTENSION OF
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT RICHLAND
HOLDINGS, INC. DBA ACCOUNTCORP
OF SOUTHERN NEVADA'S MOTION TO
DISMISS

23 (First Request)

24 WILLIAM BERRY, JR (“Plaintiff”) and Defendant RICHLAND HOLDINGS, INC. DBA
 25 ACCOUNTCORP OF SOUTHERN NEVADA (“Richland”), collectively the “Parties”, hereby jointly
 26 submit this motion (“Joint Motion”) for an extension of time for Plaintiff to file a response to Richland’s
 27 Motion to Dismiss (“Motion to Dismiss”) to **January 13, 2021**. This is the same date Plaintiff’s response
 is due to Plus Four Inc.’s Motion to Dismiss. Additionally, Richland’s reply brief, if any, shall be
 extended to **February 10, 2021**, the same date Plus Four’s reply brief is due (Plus Four is another
 Defendant in this matter). Richland’s Motion to Dismiss was filed on December 22, 2020 and appears
 on the docket as ECF #13. Plaintiff’s current deadline to respond to Richland’s Motion to Dismiss is
 January 5, 2021.

1 The reason for the request is because of the holidays, counsel for Plaintiff needs additional time
 2 to communicate with Plaintiff about the issues raised in the Motion to Dismiss, and fully examine and
 3 respond to the arguments and legal analysis set forth in the Motion to Dismiss and evaluate whether
 4 dismissal or an amended pleading would resolve the issues raised in the Motion to Dismiss.

5 This is the Plaintiff's first request for an extension and this Joint Motion has not been submitted
 6 for the purpose of delay or other impermissible purpose. Richland will not be prejudiced by the delay
 7 and has agreed to the extensions of time. Additionally, the requested extension will not prejudice or
 8 directly affect the other Defendants in this case. Accordingly, it is requested that the Court grant the
 9 extension of time to respond to the Motion to Dismiss to January 13, 2021 and any reply brief to February
 10, 2021.

12 Dated: January 5, 2021.
 13

14 Submitted By:

15 _____
 16 /s/ *Shawn W. Miller*
 17 David H. Krieger, Esq.
 18 Shawn W. Miller, Esq.
 19 KRIEGER LAW GROUP, LLC
 20 2850 W. Horizon Ridge Pkwy., Suite 200
 21 Henderson, Nevada 89052
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14 No Opposition:

15 _____
 16 /s/ *Jared M. Moser*
 17 Chad F. Clement, Esq. (NSB 12192)
 18 Jared M. Moser, Esq. (NSB 13003)
 19 MARQUIS AURBACH COFFING
 20 10001 Park Run Drive
 21 Las Vegas, Nevada 89145
 22 Attorneys for Defendant
 23 Richland Holdings, Inc., dba AcctCorp of
 24 Southern Nevada

21 **ORDER GRANTING EXTENSION OF TIME**

23 IT IS SO ORDERED.



24 _____
 25 UNITED STATES DISTRICT JUDGE

26 Dated: January 5, 2021
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